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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 HAYRI OLIVAS-ARENAS, individually,
12 Plaintiff,

13 vs.

14 HOBBY LOBBY STORES, INC. d/b/a
15 HOBBY LOBBY #679 d/b/a HOBBY
16 LOBBY; 2199 NORTH RAINBOW
17 BOULEVARD HOLDINGS, LLC; DOES 1
through 100 and ROE CORPORATIONS 1
through 100, inclusive,

18 Defendants.
19

Case No.: 2:19-cv-00624-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE
FOR FILING RESPONSES TO
DEFENDANTS' MOTIONS IN LIMINE**

20 Plaintiff HAYRI OLIVAS-ARENAS, by and through her attorneys of record, FARHAN
21 R. NAQVI and PAUL G. ALBRIGHT of NAQVI INJURY LAW, and Defendant HOBBY
22 LOBBY STORES, INC. d/b/a HOBBY LOBBY #679 d/b/a HOBBY LOBBY ("Defendants"), by
23 and through its attorney of record, MICHAEL P. LOWRY of WILSON, ELSER, MOSCOWITZ,
24 EDELMAN & DICKER, LLP, hereby stipulate and agree as follows:
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26 ///

27 ///



1 **IT IS HEREBY STIPULATED AND AGREED** that the deadline for Plaintiff to file her
2 responses to all motions in limine recently filed by Defendants be extended to **October 27, 2023**,
3 including:

- 4 1. *Hobby Lobby Stores, Inc. 's Motion in Limine 1: Thomas Jennings* [Doc. 58];
- 5 2. *Hobby Lobby Stores, Inc.'s Motion in Limine 2: Causation Testimony from Treating*
6 *Physicians* [Doc. 59];
- 7 3. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 3: Undisclosed Damages* [Doc. 60];
- 8 4. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 4: Mark James' Felony Conviction* [Doc.
9 61];
- 10 5. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 5: Speculation as to When Spill was*
11 *Created* [Doc. 62]; and
- 12 6. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 6: Post Fall Investigation* [Doc. 63].

13 In accordance with L.R. 16-3(a), replies will only be allowed with leave of court.

14 This stipulation is not brought for purposes of undue delay or any other improper purpose.
15 Several good causes exist for this extension. Firstly, the trial in this matter is currently set for
16 January 29, 2024, thereby **rendering December 29, 2024 as the deadline to file motions in**
17 **limine** pursuant to L.R. 16-3(a). **Defense counsel filed the foregoing motions six (6) months**
18 **early** out of an abundance of caution, as he is concerned that he will be very busy at the end of
19 the year with other trials.
20

21 Secondly, not only will Plaintiff's counsel be **out of the office next week** for a pre-
22 **planned family vacation**, he is also **undergoing surgery** the following week with a minimum
23 **recovery time of one week thereafter**.
24

25 Thirdly, **Plaintiff's counsel has a trial on the July 31, 2023 stack** in a state district court
26 case that was filed in July 2020, wherein the judge has indicated that it is highly likely that the
27



1 trial move forward towards the end of August because it is one of the oldest cases on said stack.
2 The trial is expected to last at least two (2) weeks and settlement appears unlikely.

3 Lastly, the parties are scheduled to participate in a settlement conference on August
4 9, 2023 before the Honorable U.S. Magistrate Judge Cam Ferenbach. Defendant's motions will
5 be moot if this matter resolves at the settlement conference or shortly thereafter.
6

7 Therefore, the parties respectfully request that the deadline for Plaintiff to file her
8 responses to all of Defendant's recently filed motions in limine be extended from July 7, 2023 to
9 **October 27, 2023**, which is still two (2) months prior to the deadline to file motions in limine.

10 DATED this 30th day of June, 2023.

DATED this 30th day of June, 2023.

11 NAQVI INJURY LAW

WILSON ELSEER MOSKOWITZ EDELMAN
& DICKER, LLP

13 /s/ Paul G. Albright
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20 *Attorneys for Plaintiff*

/s/ Michael P. Lowry
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Las Vegas, NV 89119
Attorney for Defendants

IT IS SO ORDERED:

21 
22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE

24 DATED this 3rd day of July, 2023.